



PRODUCTS CORPORATION

HOME OFFICE

P.O. BOX 737
NORRISTOWN, PENNSYLVANIA 19404
TELEPHONE 215-277-1010 CABLE: SPRAYCO

July 25, 1983

Ms. Shirley D. Bulkin
RCRA Administrative Support Section
Permits Enforcement Branch
Region III, U.S. Environmental Protection Agency
6th & Walnut Streets
Philadelphia, PA 19106

RE: EPA I.D. No. PAD 04 271 6084

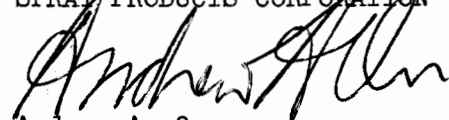
Dear Ms. Bulkin:

Having reviewed the requirements for Part B of the application for a Hazardous Waste Management Facility Permit and the continuing requirements for the operation of the site, we have determined that we will remove the storage facility from the system. In the future we will contract to have our waste removed within 90 days of being placed in storage.

We will close the facility during August, 1983 and will retain Emcon Associates, Pottstown, PA to certify that the facility has been closed in accordance with the specifications of an approved closure plan.

Sincerely,

SPRAY PRODUCTS CORPORATION


Andrew A. Orr
President

AAO/lmw

cc: George W. Buchanan, Emcon Associates



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
1875 New Hope Street
Norristown, PA 19401
215 631-2420



March 4, 1983

Mr. Andrew Orr, President
Spray Products Corporation
P. O. Box 737
Norristown, PA 19404

Re: EPA Identification No. PAD042716084
Facility Name: Spray Products Corporation
Conshohocken Road
Plymouth Township, PA 19401

Dear Mr. Orr:

This letter constitutes a formal request for Part B of your application for Hazardous Waste Management Facility Permit under the Hazardous Waste Management Regulations, 25 PA Code Chapter 75, Subchapter D, for the facility referred above. This request is made under the authority of Section 75.265(z)(6) of the regulations. You should refer to the hazardous waste management regulations that appeared in the Pennsylvania Bulletin dated September 4, 1982, which was recently mailed to you for the requirements of the Part B application. Your Part B application must be submitted no later than September 1, 1983. If there is information that is being claimed as confidential, indicate this according to the requirements of Section 75.265(z)(16).

If your facility is not a TSD (treatment, storage or disposal site), or if you stopped functioning as a TSD facility after November 19, 1980, or if you qualify under the Permit by Rule provision of the regulations, it will be necessary for you to contact one of our field offices, and to arrange for an inspection to confirm this. Our field offices and the areas covered are the Bethlehem Office, phone number 861-2070, covering Berks, Lehigh and Northampton Counties; and the Norristown Office, phone number 631-2420, covering Philadelphia, Bucks, Chester, Delaware and Montgomery Counties.

If you functioned as a TSD after November 19, 1980, it will be necessary for you to submit four copies of a closure plan to Mr. Bruce Beitler of this office.

Enclosed are reference checklists for your Part B application that are to be used to insure your application contains the minimum information required. These checklists are to be used to assist you in your Part B application and our subsequent review, although the checklists are not a substitute for reviewing and addressing the hazardous waste regulations themselves. Because you may be anticipating additional facilities at your location, we have included checklists for every type of facility covered by the Department requirements. Please use only those checklists that apply to the types of facilities for which you are making application.

Your Part B application will be reviewed for a hazardous waste management TSD Permit by both the U. S. Environmental Protection Agency and the Department of Environmental Resources until the Commonwealth of Pennsylvania receives Phase II Interim Authorization under the RCRA Program to solely administer a permitting program.

You should submit the Part B application to both agencies for their concurrent review. This would require that the hazardous waste requirements under Pennsylvania regulations as well as the hazardous waste management requirements under the Federal program would have to be addressed.

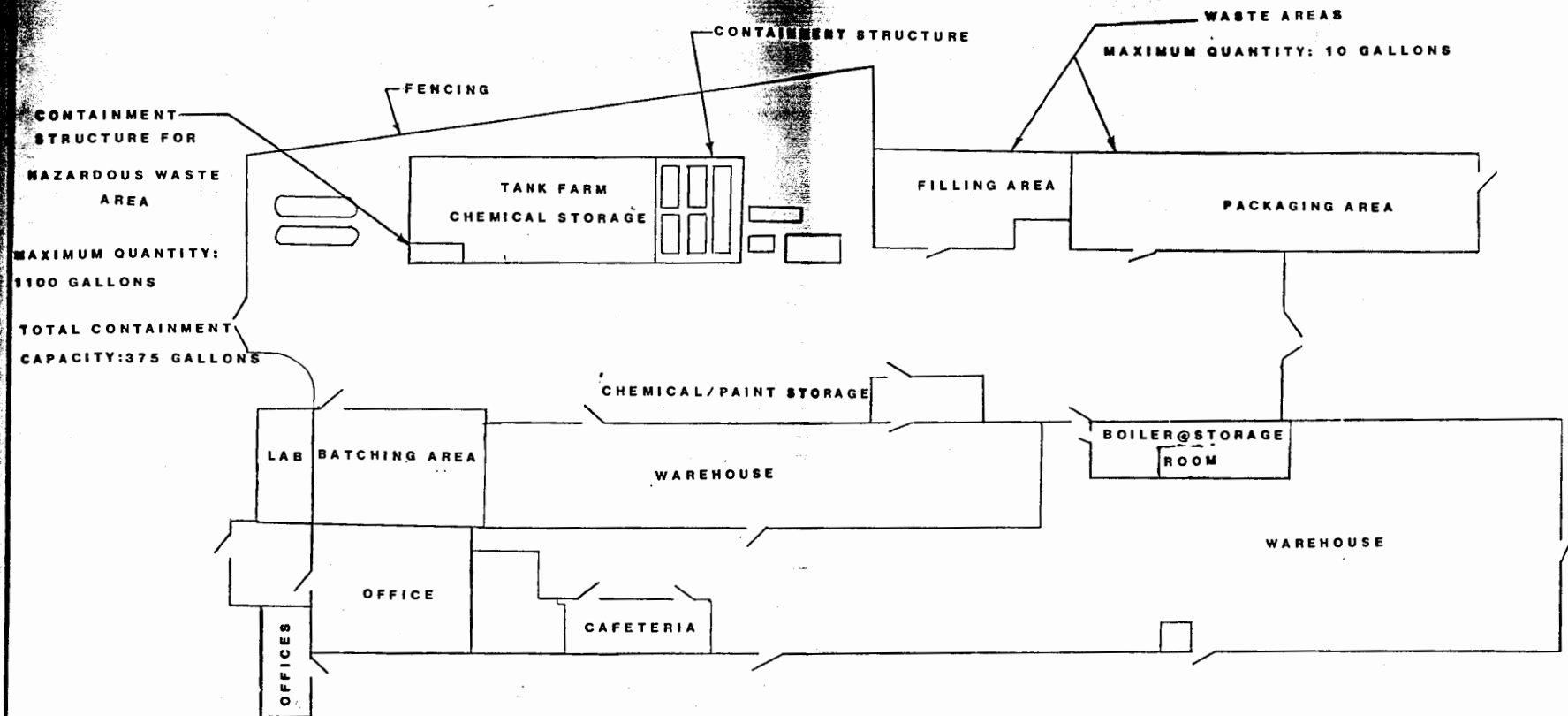
When completed, please transmit your application and five copies (or seven copies if there is an incineration facility) to our office, and if you have any questions or desire to have a pre-application conference, please contact Mr. Lawrence H. Lunsik, Solid Waste Facilities Supervisor, at the letterhead address, or by calling 215 631-2420.

Very truly yours,

WAYNE L. LYNN
Regional Solid Waste Manager

Re P770

ENCLOSURE



SCALE 1"=40'



Emcon
Associates

POTTSTOWN, PENNSYLVANIA

SPRAY PRODUCTS CORPORATION

NORRISTOWN, PENNSYLVANIA

**SOURCES AND STORAGE AREAS OF CHEMICALS
AND WASTE PRODUCTS**

**FIGURE
2**

PROJECT NO.
440-1.1



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
1875 New Hope Street
Norristown, PA 19401
215 631-2420



March 4, 1983

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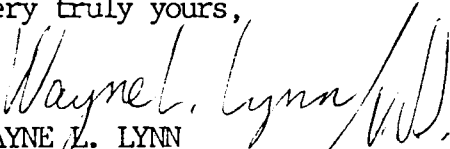
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Very truly yours,


WAYNE L. LYNN
Regional Solid Waste Manager

Re P770

ENCLOSURE

RECEIVED

MAR 9 1983

SPRAY PRODUCTS CORP.

PREPAREDNESS, PREVENTION

AND CONTINGENCY PLAN

Submitted to

SPRAY PRODUCTS CORPORATION
P.O. Box 737
Norristown, Pennsylvania 19404

February 1984

EMCON Associates
1455 Schuylkill Road
Pottstown, PA 19464
Project 440-01.01

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PREPAREDNESS, PREVENTION, AND CONTINGENCY PLAN

This section contains the following information:

- Facility description and operations
- Preventive procedures
- Contingency and emergency plan
- Pollution incident history

Copies of this complete document are maintained at the facility and have been submitted to local police and fire departments, hospitals and emergency response teams.

This PPC Plan has been and will continue to be reviewed and amended if necessary whenever:

- The plan fails in an emergency
- The facility changes in its design, construction, operation, maintenance, or other circumstances which materially increase the potential for fire, explosion, emission or discharge hazardous waste or which change the response necessary in an emergency
- The list of emergency coordinators changes
- The list of emergency equipment changes

PREPAREDNESS, PREVENTION, AND CONTINGENCY PLANS

INTRODUCTION

The Preparedness, Prevention, and Contingency Plan herein called the PPC Plan, is a document required by the state and federal agencies to describe, coordinate, and implement preventive approaches to address potential problems. The PPC Plan provides guidelines to manage emergency situations affecting the environment and public health and safety. The elements and format of this PPC Plan for Spray Products Corporation storage facility is outlined in Table 1. A copy of this document is readily available in the office of the facility for all employees to become thoroughly familiar with the plan. In addition to the site copies, additional copies of the PPC Plan will be made available to local fire, police, medical services, and other local emergency management agencies which may become involved in an actual emergency.

TABLE 1

ELEMENTS AND FORMAT OF THE PPC PLAN

General description of the industrial or commercial activity

Organizational structure for implementation of the PPC Plan

Material and waste inventory

Material compatibility

Inspection and monitoring program

Preventive maintenance

Housekeeping program

Security

External factors

Internal and external communications

Employee training program

List of emergency coordinators

Duties and responsibilities of the emergency coordinator

Chain of command

List of agencies to be notified

Emergency equipment

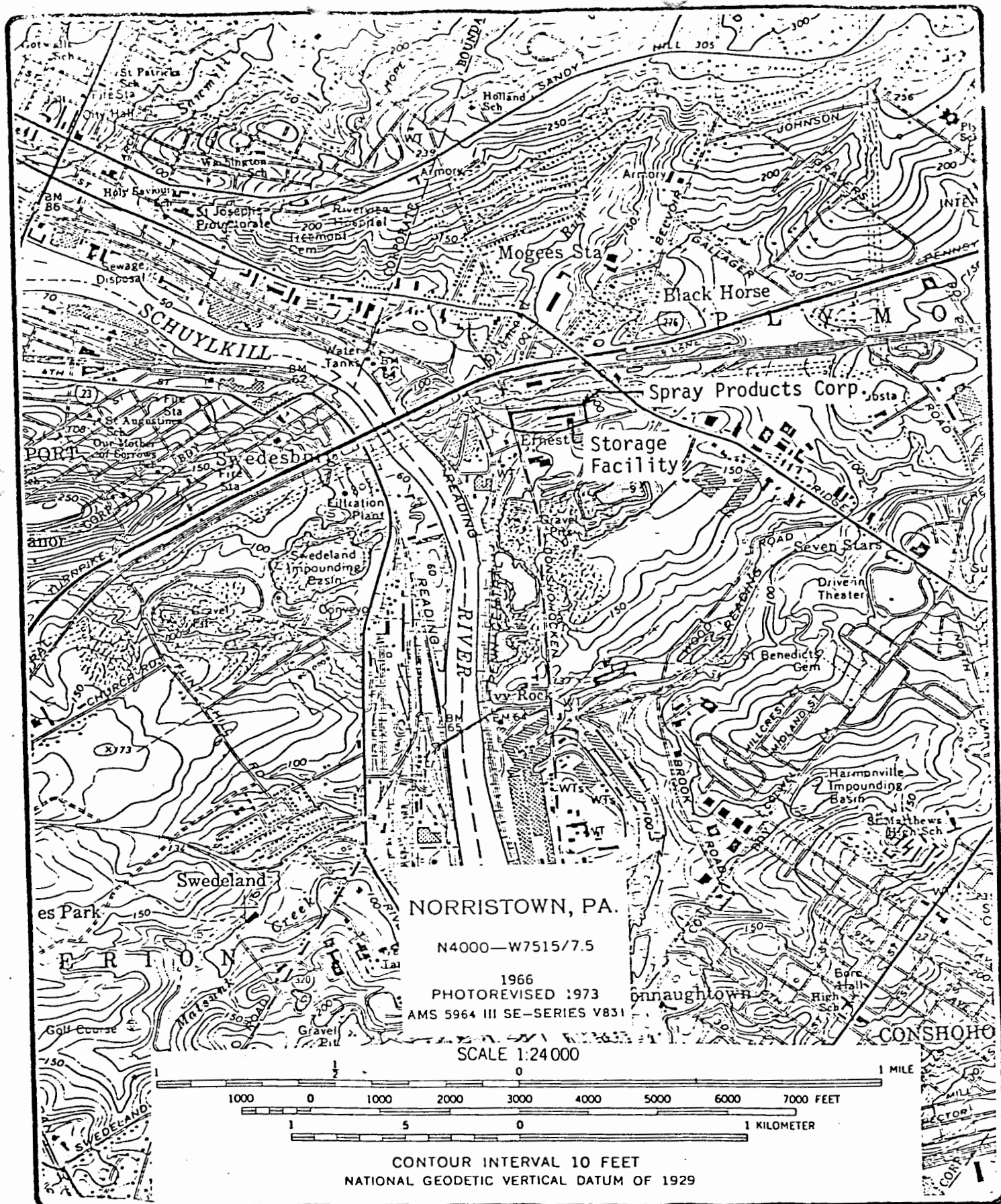
Evacuation plan for installation personnel

Arrangements with emergency response contractors

Agreements with state and local emergency response teams and hospitals

Contingency
Plan

Pollution incident history



EMCON
Associates

1455 Schuylkill Road
Pottstown, PA 19464

Spray Products Corporation

LOCATION MAP

FIGURE

1

PROJECT NO.
440-01.01

GENERAL DESCRIPTION OF THE INDUSTRIAL ACTIVITY

Spray Products Corporation operates a small hazardous (ignitable) waste storage facility at its Plymouth Township plant.

The facility is located on an approximately seven acre tract of land in Plymouth Township northwest of Conshohocken, just off Conshohocken Road. Access to the site is only from Conshohocken Road. The site is bounded by the Penn Central Railroad on the south, Ridge Pike to the east, Conshohocken Road to the west and private business to the north. The area immediately surrounding the plant is in industrial and manufacturing useage.

Spray Products Corporation is a packager of automotive and industrial chemical specialties and aerosol paints. In their packaging process they generate "dirty" wash solvent from their clean-up operation. This "dirty" paint solvent is stored in drums for pick-up in a tank wagon by a solvent reclaimer. The yield of "clean" solvent is then recycled.

The plant operations require only a small storage area where drums of dirty wash solvent are stored. The storage area is on top of a concrete slab and has a small berm which will prevent any spillage or leaks from leaving the pad. The storage facility is located in an area where run-on will not occur. Rainwater within the facility is collected and stored in drums prior to being disposed of at an approved facility.

Figure 1 is the 7.5 minute USGS location map showing the plant and storage facility locations. Figure 2 shows the sources and storage areas of the wastes.

ORGANIZATION

The organizational structure which exists to implement the PPC Plan is as shown on Figure 3. In the event of a fire or emergency, the appropriate individuals and/or fire company are contacted either by Spray Products Corporation personnel (day) or Wells Fargo security personnel (night).



Wells Fargo Alarm Services

455 N. 5th Street, Philadelphia, Pa 19123

FIRE ALARM - EMERGENCY LIST

IMPORTANT: This notification list MUST be in the hands of WELLS FARGO three (3) days prior to the alarm system being put into service. If this document has not been received, the alarm system will not be activated. This is critical and should be processed as soon as possible.

NAME Spray Products Corporation FA# 1262

ADDRESS Conshohocken Road & Elm Street

CITY Norristown STATE PA ZIP 19401

PHONE (day) 277-1010 (nite) _____

FIRE DEPARTMENT HARMONVILLE FIRE CO

PHONE (day) 828-0130 (nite) _____

PERSONS TO BE NOTIFIED FOR EMERGENCY, IN THE FOLLOWING ORDER:

1. WARRENSE NICHOLSON Phone# 489-3614

2. ALFRED SOHN Phone# 272-6231

3. JAMES MCARTHUR Phone# 279-9021

4. ANDREW A. ORR Phone# 688-3520

5. _____ Phone# _____

6. _____ Phone# _____

AUTHORIZED BY: ANDREW A. ORR Title PRESIDENT

SIGNATURE: Andrew Orr Date 9/28/82

SEND SPECIAL REPORTS TO:

NAME ANDREW A. ORR Title PRESIDENT

ADDRESS P.O. BOX 737

CITY NORRISTOWN STATE PA ZIP 19404

MATERIAL AND WASTE INVENTORY

The Part A application submitted for this plant lists the types and quantity of material Spray Products Corporation stores at its facility.

The following Table 1 is the complete list of waste, the EPA hazardous waste number, and a description of each one.

TABLE 1

K078	Paint manufacturing wastes - listing suspended by EPA
D001	Ignitability
U001	Acetone

MATERIAL COMPATIBILITY

All of the hazardous wastes from Spray Products Corporation's manufacturing processes are compatible.

INSPECTION AND MONITORING PROGRAM

Routine manufacturing procedures and practices include routine inspection of all equipment at the facility. The storage facility is inspected at least weekly (see attached inspection form) to assure that no leaks or spills have occurred. Inspection reports are kept on file by the Plant Manager.

INSPECTION OF DRUM STORAGE FACILITY

[illegible]

PREVENTIVE MAINTENANCE AND HOUSEKEEPING PROGRAM

Routine inspection of all operating and structural equipment is a good preventive maintenance measure. All employees are trained thoroughly in safety procedures for handling toxic wastes and related equipment.

All personnel are required to maintain the facilities in a neat and orderly fashion. All pallets are marked for storage configuration. The pad is kept free of dirt and any liquids. Cleaning is done on an as needed basis.

SECURITY

All entrance gates to the storage facility are locked after working hours.

The main entrance to the facility has no smoking and safety glasses requirements posted. A list of the Emergency Coordinators' names and telephone numbers is also posted.

All visitors must enter the building at the front entrance and check in with the secretary.

EXTERNAL FACTORS

In the event of a power failure or other external emergency, emergency exit doors are available at each location for employees inside the buildings to evacuate quickly.

COMMUNICATIONS

A public address system is installed throughout the plant inside as well as outside. In the event of an emergency, all employees are able to be notified of emergency instructions and/or procedures via this system.

Telephone communications are available on and off site in the event local fire, police and/or emergency groups would need to be contacted.

EMPLOYEE TRAINING PROGRAM

All new employees receive on the job training regarding evacuation routes, emergency procedures, wearing and use of protective equipment, and materials handling procedures. Current employees receive updated information as soon as it becomes available.

EMERGENCY COORDINATOR

Emergency Coordinator	Clarence Nicholson	489-3614
First Alternate	Alfred Sohn	272-6231
Second Alternate	James McArthur	279-9021
Third Alternate	Andrew Orr	688-3520

All of the above individuals are thoroughly familiar with Spray Products Corporation's emergency and fire procedures. They are familiar with the plant layout, location of file records, location and characteristics of all hazardous waste materials handled at the plant. Any of the above individuals have the authority, should it be required, to commit whatever resources are necessary to respond to an emergency.

EMERGENCY COORDINATOR DUTIES AND RESPONSIBILITIES

In the event that an emergency situation involves hazardous waste material, the Emergency Coordinator will be contacted. The Coordinator will assist local police and fire departments in controlling the emergency and will assist local and state authorities in assessing the impact of the situation. The Coordinator will locate the operating records and when a release occurs, identify the content, exact source, amount, and extent of the release. The Coordinator will assess the possible hazards to health and the environment and, if such hazards exist, he must immediately notify the National Response Center (1-800-424-8802). If evacuation is advisable, he must immediately notify the local authorities. Immediately after an emergency, the Emergency Coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water or any other material contaminated from the release.

CHAIN OF COMMAND

In the event of an emergency or fire, all employees are hereby notified to follow the chain of command listed below when reporting a hazardous waste spill, emergency or fire.

Employees or security guards contact:

<u>Name</u>	<u>Position</u>	<u>Phone Extension</u>	<u>Home Phone</u>
Clarence Nicholson	Plant Manager		489-3614
or			
Alfred Sohn			272-6231
or			
James McArthur			279-9021
and			
Andrew A. Orr	President		688-3520

LIST OF AGENCIES TO BE NOTIFIED

In the event of a hazardous waste emergency or fire, the following agencies and individuals will be notified:

Fire Department - Harmonville Fire Company 828-0130

Police Department 279-1900 or 275-1222

Ambulance Corps 279-4020 or 631-3222

Clarence Nicholson 489-3614

Andrew Orr 688-3520

State Response Team 717-787-4343

National Response Center 800-424-8802

EMERGENCY EQUIPMENT

The equipment available for hazardous waste spills and/or fire emergencies is listed below. The locations of the equipment are shown in Figure 4.

1. Internal communications and alarm systems
2. Telephones
3. Fire extinguishers, automatic sprinkler system, decontamination equipment
4. Water at adequate volume and pressure to assist in firefighting

Specifically, the equipment consists of the following:

LIST OF EMERGENCY EQUIPMENT

Two (2) 1" sandpiper air-driven self-priming pumps

Oil dri absorbant

One (1) 30# dry powder fire extinguisher

One (1) 15# carbon dioxide fire extinguisher

Other fire extinguishers throughout building

Public address system operated through all telephones with speakers throughout buildings and fenced yard

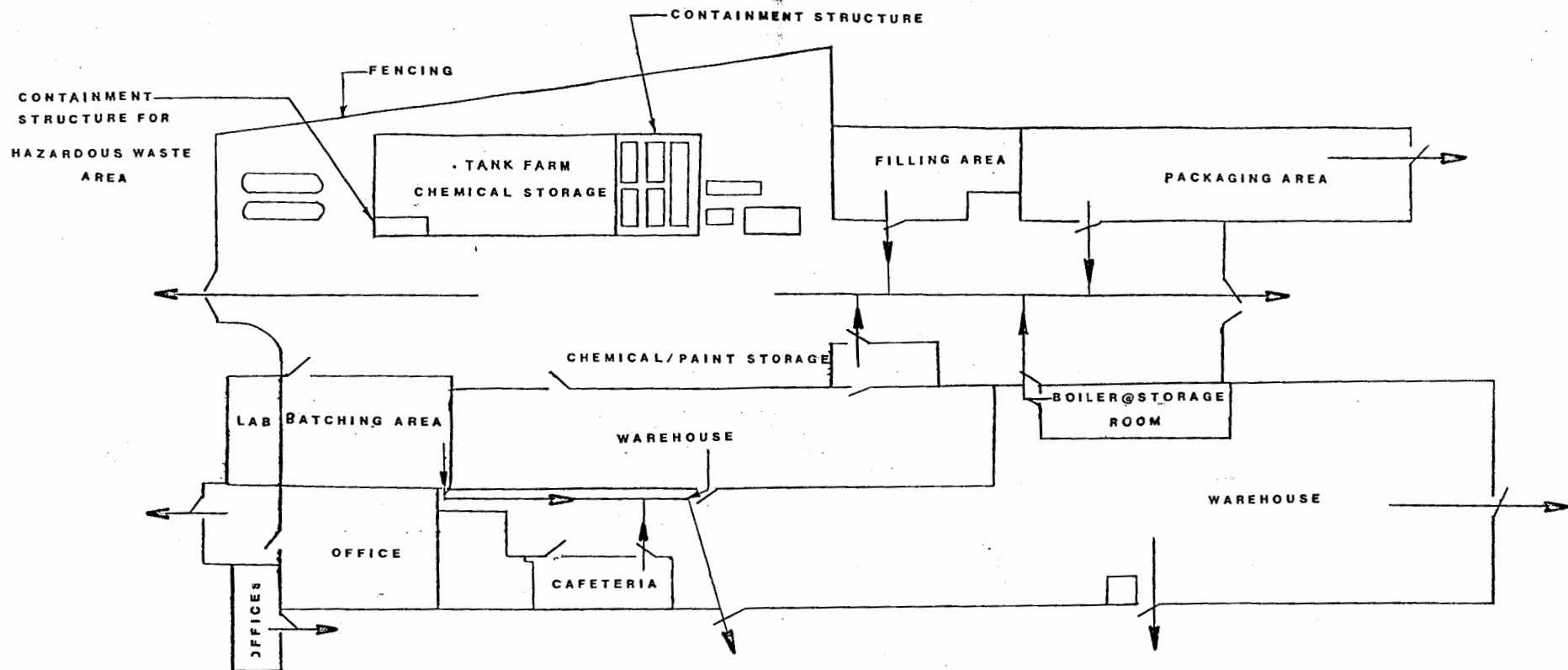
Empty drums to be used in the event of a spillage

EVACUATION PLAN

In the unlikely event that a spill of or fire involving hazardous waste results in the need for all employees to evacuate the building, the following procedures are followed:

- a. All employees in the plant are notified by public address system to evacuate the plant. An evacuation alarm is then sounded in the event that certain employees may not have heard the PA announcement.
- b. Evacuation routes are shown on Figure 5. These routes have been marked with OSHA approved signs and lettering.

Twice per year drills are held to familiarize new employees with the procedure. The drills also serve to retrain current employees in proper evacuation procedures and routes and to evaluate the efficacy of the evacuation plan as a whole.



NOTE-TANK FARM AND STORAGE AREA IS TO BE AVOIDED DURING EVACUATION PROCEDURES

SCALE 1"=40'



Emcon
Associates

POTTSTOWN, PENNSYLVANIA

SPRAY PRODUCTS CORPORATION
NORRISTOWN, PENNSYLVANIA

EVACUATION ROUTES FOR EMERGENCY RESPONSE

FIGURE

5

PROJECT NO.
440-1.1

EMERGENCY RESPONSE CONTRACTORS

In the event that a release of hazardous wastes, a fire, or an emergency occurs, Spray Products Corporation will contact the following agencies:

1. Harmonville Fire Company 828-0130
2. Plymouth Township Police 279-1900 or 275-1222
3. Montgomery Hospital 631-3222
4. National Response Center 800-424-8802
 (If a reportable quantity)
5. Pennsylvania Department 631-2420
 of Environmental Resources

If Spray Products Corporation is unable to clean up or contain any spilled or released hazardous wastes, the following contractors will be contacted to conduct clean-up operations:

Delaware Container Corporation
West 11th Avenue and Valley Road
Coatesville, Pennsylvania 19320
Telephone: 215-383-6600

Eldridge, Inc.
898 Fern Hill Road
West Chester, Pennsylvania 19380
Telephone: 215-436-4749

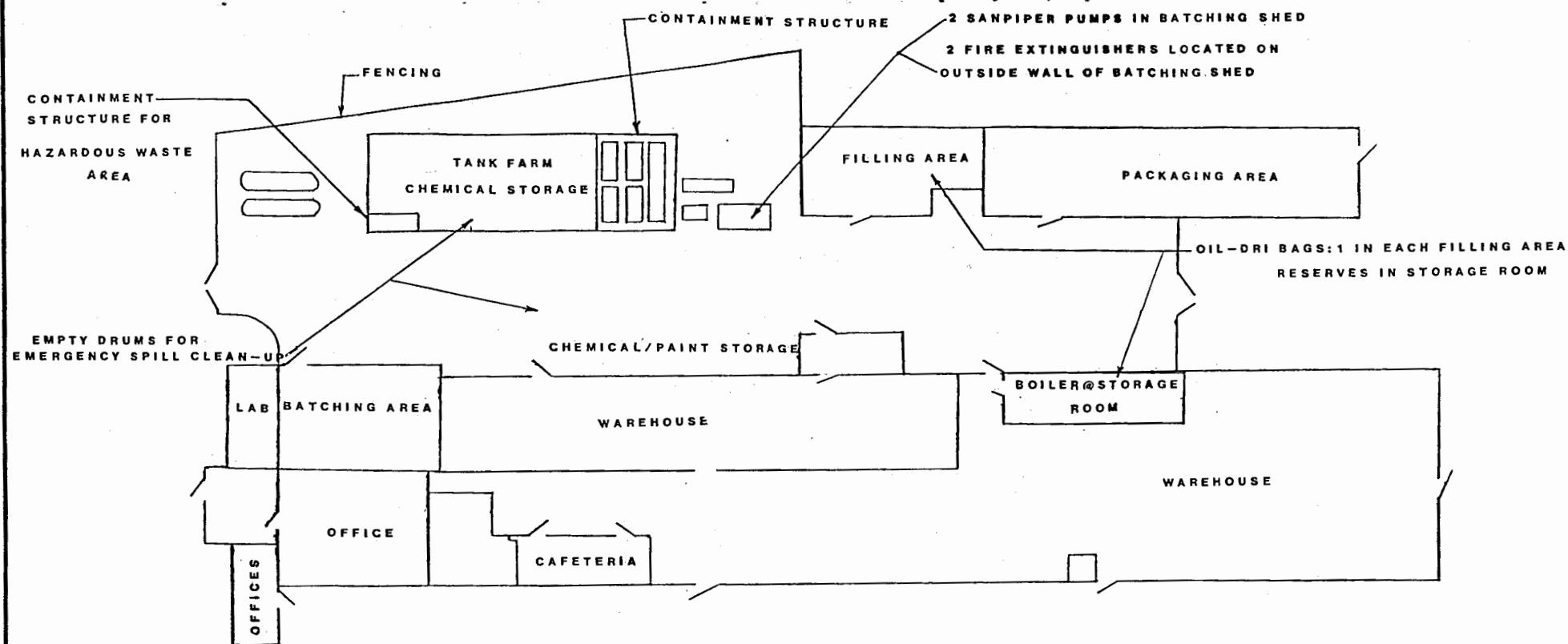
EMERGENCY RESPONSE TEAMS

The phone numbers for emergency actions are:

Police Department	825-6530
Fire Department	828-2220
Ambulance Corps	828-2220
Hospital	278-2000
Poison	922-5523
State Response Team	717-787-4343
National Response Center	800-424-8802

POLLUTION INCIDENT HISTORY

Spray Products Corporation has not had any reportable pollution incidents in the history of the company.



SCALE 1"=40'



Emcon
Associates

POTTSTOWN, PENNSYLVANIA

SPRAY PRODUCTS CORPORATION

NORRISTOWN, PENNSYLVANIA

EMERGENCY EQUIPMENT

LOCATION DRAWING

FIGURE

4

PROJECT NO.
440-1.1